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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MICHAELA MANAGO,

Plaintiffs,

vs.

HAP TRUCKING LTD; HAP  
TRANSPORTATION GROUP, LTD;  
GURHAM SINGH GILL and DOES 1-25,  
INCLUSIVE,

Defendants.

Case No.: 2:24-cv-01496-TLN-CKD

**STIPULATION AND ORDER RE  
MODIFICATION OF PRETRIAL  
SCHEDULING ORDER**

THE PARTIES, THROUGH THEIR COUNSEL OF RECORD, agree to the following modifications to the Court's Pretrial Scheduling Order:

1. The parties have acted diligently throughout this matter, but due to a number of outstanding legal and discovery issues, the parties agree that additional time is necessary to complete discovery and prepare the matter for trial. The outstanding issues include:
  - a. Additional time will permit the parties to continue with meaningful discovery and investigation and to coordinate depositions of party witnesses, third party witnesses, and medical treaters;
  - b. Plaintiff continues to treat and recover from her collision related injuries, and there may

be a substantial change in her treatment and/or recovery after the close of discovery;  
and

c. Additional time will permit the parties to explore alternative dispute resolution  
following the completion of additional discovery;

2. The parties agree that they have proceeded in good faith, and any delay is not due to a lack of  
diligence.

3. The parties agree that the deadlines set forth in the related Garcia matter (Plaintiff has recently  
filed a motion to consolidate this matter with the Garcia matter) would be most appropriate.

4. Subject to court approval, the parties have agreed to the following deadlines regarding  
discovery, expert discourse and the filing of dispositive motions:

a. Discovery, with the exception of expert discovery, shall be completed by September  
16, 2025

b. The initial expert disclosure deadline shall be November 14, 2025

c. The supplemental expert disclosure deadline shall be December 15, 2025

d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged  
no later than February 13, 2026

e. Dispositive motions shall be filed no later than March 16, 2026

Dated: March 3, 2025

**EASON & TAMBORNINI**

/s/ Kristofor K. Helm

KRISTOFOR K. HELM

Attorney for Plaintiffs

Dated: March 3, 2025

**LAW OFFICES OF WILLIAM L. BAKER**

/s/ David A. Serrano

DAVID A. SERRANO

Attorney for Defendants

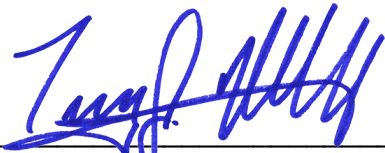
ORDER

Good Cause appearing and based on the stipulation of the parties, the Pretrial Scheduling Order is modified as follows:

- a. Discovery, with the exception of expert discovery, shall be completed by September 16, 2025
- b. The initial expert disclosure deadline shall be November 14, 2025
- c. The supplemental expert disclosure deadline shall be December 15, 2025
- d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged no later than February 13, 2026
- e. Dispositive motions shall be filed no later than March 16, 2026

IT IS SO ORDERED.

Dated: March 3, 2025

  
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Troy L. Nunley  
Chief United States District Judge